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Counsel for General Instrument Corporation,
doing business as Home & Networks Mobility business of Motorola, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., et al.,

Debtors.

Chapter 11

Case No. 08-35653 (KRH)
(Jointly Administered)

**PRELIMINARY RESPONSE OF GENERAL INSTRUMENT CORPORATION DOING
BUSINESS AS HOME & NETWORKS MOBILITY BUSINESS OF MOTOROLA, INC.
TO DEBTORS' FORTY-FOURTH OMNIBUS OBJECTION TO CLAIMS
(DISALLOWANCE OF CERTAIN DUPLICATE CLAIMS)**

General Instrument Corporation doing business as Home & Networks Mobility business of Motorola, Inc. ("Home & Networks"), by and through its undersigned counsel, submits its Preliminary Response (the "Preliminary Response") to the Debtors' Forty-Fourth Omnibus Objection to Claims (Disallowance of Certain Duplicate Claims) (the "Objection"), and in support respectfully states as follows:

1. On or about December 19, 2008, Home & Networks filed a 503(b)(9) claim against Debtor Circuit City Stores, Inc. for \$85,321.74 which is listed by the Debtors as claim number 1321. On or about December 19, 2008, Home & Networks filed a 503(b)(9) claim against Debtor Circuit City Stores, Inc. for \$85,321.74 which is listed by the Debtors as claim number 13097. On or about September 21, 2009, the Debtors filed the Objection. Pursuant to the Objection, the Debtors seek to disallow duplicative claims. Home & Networks objects to the relief requested in the Objection.

2. Home & Networks files this Preliminary Response in lieu of a formal pleading pursuant to the Debtors' authorization to Home & Networks' counsel on October 22, 2009. Accordingly, Home & Networks reserves all rights with respect to its claims and the right to supplement the Preliminary Response at a later date.

3. Contact information for Home & Networks is as follows:

Motorola, Inc.
101 Tournament Drive
Horsham, PA 19044
ATTN: Frederick L. Peters, Senior Counsel

WHEREFORE, Home & Networks respectfully requests that its claims be excluded from any order approving the Objection and such other relief as is just and proper.

Date: October 27, 2009

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Counsel for General Instrument Corporation doing
business as Home & Networks Mobility business of
Motorola, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Preliminary Response of General Instrument Corporation Doing Business as Home & Networks Mobility Business of Motorola Inc. to Debtors' Forty-Fourth Omnibus Objection to Claims (Disallowance of Certain Duplicate Claims)* was filed electronically with the court via the CM/ECF system on the 27th day of October, 2009 and first-class mail to the following:

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United States Bankruptcy Court
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